

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Boston Edison Company )  
Cambridge Electric Light Company )  
Commonwealth Electric Company )  
d/b/a NSTAR Electric )

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D.T.E. 03-121

**NSTAR ELECTRIC FIRST SET OF INFORMATION REQUESTS TO THE  
JOINT SUPPORTERS**

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by NSTAR Electric in this proceeding.

1. Each request should be answered in writing on a separate page (paginated) with a recitation of the request, the identification number of the request (for example, NSTAR-JS-1-1), the docket number of the case, the date of the response, and the preparer of the response or the name of the person responsible for the answer. Please mark each page of an answer with the identification number of the request. In addition, please clearly reference any attachments to a response with the number of the request to which it applies and include page numbers on all attachments.
2. Please do not wait for all responses to be completed before supplying answers, but instead please provide the answers as they are completed.
3. These information requests shall be deemed continuing in nature so as to require further supplementation if the Joint Supporters or their witnesses receive or generate additional information within the scope of those requests between the time of the original response and the close of the record in these proceedings.
4. The terms used interchangeably within these information requests relating to "any and all", "documentation", "support", and "justification" mean provide all data, assumptions, and calculations relied on. Provide the source of and basis for all data and assumptions employed. Include all studies, drafts, memos, reports, and planning documents from which such data, estimates and assumptions were used. Provide and explain any and all supporting workpapers.

5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phonographic records, microfilm, microfiche, computer printouts, memoranda, letters, correspondence, handwritten notes, records and reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If the Respondent believes that any of these information requests are ambiguous or need clarification, please contact David Rosenzweig or Stephen August at (617) 951-1400 so that the requests can be clarified prior to the preparation of a written response.
7. If an answer provides a reference to another information response, please provide that response with the answer.
8. If a question refers to an information request of another party, please provide an answer with information that supplements the previous responses.

### **Information Requests**

#### **Information Requests Relating to the Prefiled Testimony of Mr. Lively**

- NSTAR-JS-1-1 Please provide copies of (1) all prefiled testimony or reports (including all associated exhibits and attachments) submitted by Mr. Lively to state and federal regulatory authorities from 1999 to the present; and (2) transcripts of Mr. Lively's testimony at hearings (adjudicatory or non-adjudicatory) before state and federal regulatory authorities from 1999 to the present.
- NSTAR-JS-1-2 Provide copies of all regulatory decisions addressing the issues covered by Mr. Lively in testimony provided in response to Information Request NSTAR-JS-1-1. Identify the decision making authority, docket number, year of the decision, and any official citation to the decision.
- NSTAR-JS-1-3 Please list all matters on which Mr. Lively has consulted in the past five years by date beginning with the most current matters. For each matter, provide a brief description of the subject matter of the project and indicate for whom these services were provided. Please identify all documents relied upon by Mr. Lively in preparing this testimony. Please provide a copy of each identified document.
- NSTAR-JS-1-4 Referring to lines 102 to 140, please provide a copy of each article identified.

- NSTAR-JS-1-5 Please provide a copy of all articles, papers and other writings written by Mr. Lively on the following subjects:
- (a) standby service;
  - (b) distributed generation;
  - (c) distribution planning;
  - (d) rate design or cost allocation for regulated utilities; and
  - (e) PURPA and PURPA-related issues.
- NSTAR-JS-1-6 Provide copies of all correspondence between Mr. Lively and any regulated electric utility from 1999 to the present on matters relating to the subjects set forth in Information Request NSTAR-JS-1-5.
- NSTAR-JS-1-7 Identify which electric distribution companies Mr. Lively has been employed for or engaged by in his professional career for whom he has designed any portion of the company's distribution system. Identify the dates of such employment in this capacity and describe in detail the nature of Mr. Lively's design responsibilities.
- NSTAR-JS-1-8 Referring to Mr. Lively's testimony at page 9, lines 186-187, please identify the basis for Mr. Lively's belief that electric distribution companies in Massachusetts are not allowed to own or install distributed generation on their systems where such an installation is economic. Please provide specific citation to any orders of the Department or statutory provisions that set forth such a prohibition.
- NSTAR-JS-1-9 Referring to Mr. Lively's testimony at page 11, please identify what portion of an electric company's distribution is properly designed based on the non-coincident peaks of its customers. Please provide all documents that support this response.
- NSTAR-JS-1-10 Referring to Mr. Lively's testimony at page 11, lines 249 through 251, please explain in detail the reason(s) why "the efficiencies associated with distributed generation should not be a factor in the firm Standby Service proposed by NSTAR Electric in this proceeding...."
- NSTAR-JS-1-11 Referring to page 11, lines 254-255, is it Mr. Lively's position that "the purpose for which a consumer uses electricity is not a consideration" in establishing distribution rates in effect for NSTAR Electric?

- NSTAR-JS-1-12 Referring to Mr. Lively's testimony at page 12, line 264, is it Mr. Lively's position that load data for customers located on the NSTAR Electric system support the conclusion that customers with distributed generation generally do not have a load pattern that is more costly than are the load patterns of customers without distributed generation. If the answer is "yes", please provide a copy of any studies performed by Mr. Lively or the Joint Supporters that support this position.
- NSTAR-JS-1-13 Referring to Mr. Lively's testimony at page 13, lines 298-299, define the term "insignificantly different" when comparing distributed generation annual billing demand ratios to the annual billing demand ratios of similarly sized customers without distributed generation. Please provide all analysis supporting this definition and the conclusion drawn.
- NSTAR-JS-1-14 Referring to Mr. Lively's testimony at page 13, lines 305-306, please provide copies of all notes, documents or other records of his referenced "conference call."
- NSTAR-JS-1-15 Referring to Mr. Lively's testimony at pages 13 and 14, please provide an example calculation using the billing demand ratio approach presented in Mr. Lively's testimony with specific monthly customer demands over a 12-month period. Please identify all calculations and assumptions.
- NSTAR-JS-1-16 Please provide all data and any other documents provided to Mr. Lively by Ms. Saunders in relation to this proceeding.
- NSTAR-JS-1-17 Please provide: (a) any and all correspondence; and (b) any and all written notes taken of any and all telephone conversations between Mr. Lively and Ms. Saunders.
- NSTAR-JS-1-18 Referring to page 14, lines 335-336, please provide all documents supporting the statement that "[t]he utility incurs costs based on the highest diversified demand placed on its system." In particular, identify which of these documents related specifically to the distribution system.
- NSTAR-JS-1-19 Referring to page 15, lines 347-349, please provide all documents, data, studies and reports supporting the statement that "most load research suggests that the diversified demand ration increases with the customer's load factor."
- NSTAR-JS-1-20 Referring to page 15, lines 352-356, please provide all documents and studies supporting the conclusion that a "significant characteristic of customers with distributed generation is a low load factor..."

- NSTAR-JS-1-21 Please provide all studies, analyses, reports and documentation in Mr. Lively's possession that compares the annual load factor for DG customers located in the NSTAR Electric service territories relative to the annual load factors for non-standby customers of the same size classification.
- NSTAR-JS-1-22 Please provide all studies, analyses, reports and documentation in Mr. Lively's possession that compares the annual load factor for DG customers located outside of the NSTAR Electric service territories relative to the annual load factors for non-standby customers of the same size classification.
- NSTAR-JS-1-23 Provide all studies or reports that identify the load factor of distributed generation customers for that portion of their load served by customer-owned distributed generation.
- NSTAR-JS-1-24 Reference page 16, lines 386-387. Identify and provide all documents and any other support for the statement that the maximum load that a circuit must be able to sustain will be the "diversified" demand of all customers on that circuit.
- NSTAR-JS-1-25 Reference page 17, lines 392-394. Provide all documents that support the conclusion that it is "best practice" for a distribution company not to add distribution capacity to serve its standby customers on a kw-for-kw basis to meet the maximum non-coincident peak needs of each customer. What definition of "best practice" is being relied upon by Mr. Lively? Please provide a copy of this definition in a published document.
- NSTAR-JS-1-26 Referring to the "diversified demand concept" Mr. Lively describes in his testimony (Lively Testimony at 17, line 398), does Mr. Lively contend that electric distribution companies build distribution facilities on the basis of: (a) the maximum coincident demand of their customers on the distribution system or (b) the non-coincident demand of such customers? Please provide a list of all electric distribution companies that make such build decisions for their distribution system on the basis of the maximum coincident demand. Please provide all available documentation that confirms that such electric distribution companies use customers' maximum coincident demand for purposes of constructing new distribution facilities.
- NSTAR-JS-1-27 Please identify all utility companies that have adopted Mr. Lively's dynamic pricing mechanism for interruptible standby service. Provide all documents, including tariffs, reflecting this approach. Please identify all public utility commissions that have adopted Mr. Lively's dynamic pricing mechanism for interruptible standby

service. Please provide a copy of all decisions of such public utility commissions that have adopted Mr. Lively's dynamic pricing methodology.

- NSTAR-JS-1-28 Referring to page 19, lines 467-468, please provide a copy of the "standard load research" data that suggests that DG customers should pay lower demand rates than customers without DG.
- NSTAR-JS-1-29 Referring to page 24, lines 570-574. Is it Mr. Lively's understanding that NSTAR Electric's distribution system is operating in a regulated environment or a competitive market? Is it Mr. Lively's understanding that the rates of electric distribution companies in Massachusetts are subject to the authority of the Massachusetts Department of Energy and Telecommunications? Please explain.
- NSTAR-JS-1-30 Referring to page 29, lines 711-712, provide all documents relied upon to support the conclusion that there has been a lack of cooperation between NSTAR Electric and the distributed generation industry. Please identify all specific individuals who have indicated to Mr. Lively that NSTAR Electric has been uncooperative with the DG industry.

**Information Requests Relating to the Pre-Filed Testimony of Mr. Hannus**

- NSTAR-JS-1-31 Please provide copies of (1) any and all prefled testimony or reports (including all associated exhibits and attachments) submitted by Mr. Hannus to state and federal regulatory authorities from 1999 to the present; and (2) any and all transcripts of Mr. Hannus' testimony at hearings (adjudicatory or non-adjudicatory) before state and federal regulatory authorities from 1999 to the present.
- NSTAR-JS-1-32 Provide copies of any and all regulatory decisions addressing the issues covered by Mr. Hannus in testimony provided in response to Information Request NSTAR-JS-2-1. Identify the decision making authority, docket number, year of the decision, and any official citation to the decision.
- NSTAR-JS-1-33 Please identify all documents relied upon by Mr. Hannus in preparing this testimony. Please provide a copy of each identified document.
- NSTAR-JS-1-34 Please provide a copy of any and all articles, papers, speeches or other reports prepared in whole or in part by Mr. Hannus addressing, distributed generation, standby rates and/or rate design.

NSTAR-JS-1-35 Please describe in detail any and all electric self-generation systems designed by your company that have been installed by customers in Massachusetts. The identity of the customers may be redacted to protect their privacy. The description shall include, but not be limited to, the following information:

- (a) the installation date of the system;
- (b) the size (i.e., nameplate rating) of the self-generation unit;
- (c) the thermal source used to generate electricity;
- (d) the fuel used to produce the energy;
- (e) the annual number of kilowatt-hours produced (actual and estimated); and
- (f) The annual number of hours the self-generation unit is operational.
- (g) the date, duration and size (MW) of outages since the generator came on line. For each outage, identify whether it was forced or planned.

NSTAR-JS-1-36 Identify all environmental permits required to operate each of the projects identified in Information Request NSTAR-JS-2-5.

NSTAR-JS-1-37 Provide all correspondence between Co-Energy America and its customers concerning NSTAR Electric's proposed rates in this proceeding.

NSTAR-JS-1-38 Provide a copy of all presentations made by Co-Energy America concerning NSTAR Electric's proposed rates in this proceeding.

NSTAR-JS-1-39 Provide copies of all documents, studies, reports or other information sent by Co-Energy America to its customers or potential customers concerning NSTAR Electric's proposed rates in this proceeding.

NSTAR-JS-1-40 Please provide Mr. Hannus' understanding of how the provisions of NSTAR Electric's proposed standby rates concerning "grandfathering" existing DG installations would apply with respect to:

- (a) DG project operational prior to October 23, 2003;
- (b) DG projects operational prior to February 1, 2004; and

(c) DG projects installed prior to August 1, 2004.